

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION**

National Association of Diversity Officers
in Higher Education, et al.,

Plaintiffs,

v.

Donald J. Trump, in his official capacity as
President of the United States, et al.,

Defendants.

Civil Action No. 1:25-cv-333-ABA

DECLARATION OF BROOKE MENSCHEL

I, Brooke Menschel, state and declare as follows:

1. I am an attorney at Democracy Forward Foundation and counsel to all Plaintiffs in the above-captioned matter. I submit this Declaration in support of the Memorandum of Law in Support of Plaintiffs' Motion for a Temporary Restraining Order and/or Preliminary Injunction.

2. A true and correct copy of Executive Order No. 14151, 90 Fed. Reg. 8339 (Jan. 29, 2025), titled *Ending Radical and Wasteful Government DEI Programs and Preferencing*, is attached hereto as **Exhibit 1**.

3. A true and correct copy of Executive Order No. 14173, 90 Fed. Reg. 8633 (Jan. 31, 2025), titled *Ending Illegal Discrimination and Restoring Merit-Based Opportunity*, is attached hereto as **Exhibit 2**.

4. A true and correct copy of *Agenda47: Protecting Students from the Radical Left and Marxist Maniacs Infecting Educational Institutions*, dated May 2, 2023, is attached hereto as **Exhibit 3**.

5. A true and correct copy of Executive Order No. 14185, 90 Fed. Reg. 8763 (Jan. 27, 2025), titled *Restoring America's Fighting Force*, is attached hereto as **Exhibit 4**.

6. A true and correct copy of Executive Order No. 14170, 90 Fed. Reg. 8621, titled *Reforming the Federal Hiring Process and Restoring Merit to Government Service*, is attached hereto as **Exhibit 5**.

7. A true and correct copy of the Department of Labor Training and Employment Notice No. 21-24, dated January 22, 2025, is attached hereto as **Exhibit 6**.

8. A true and correct copy of an Email from HarwoodGrants@dol.gov to Ami Awad, Dev. Dir., ROC, and others, dated Jan. 22, 2025, is attached hereto as **Exhibit 7**.

9. A true and correct copy of an Email from Kate Miceli, Policy Analyst, Women's Bureau, Dep't of Labor, to Teofilo Reyes, Interim President, ROC United, dated Jan. 22, 2025, is attached hereto as **Exhibit 8**.

10. A true and correct copy of the Department of Health and Human Services', and its Centers for Disease Control and Prevention, memo to Plaintiff Baltimore dated January 29, 2025, is attached hereto as **Exhibit 9**.

11. A true and correct copy of the Department of Justice implementation memo distributed by the Attorney General to all Department of Justice Employees re: Eliminating Internal Discriminatory Practices, dated February 5, 2025, is attached hereto as **Exhibit 10**.

12. A true and correct copy of the Department of Defense implementation memo for Secretaries of the Military Departments, Chairman of the Joint Chiefs of Staff, Defense Agency and DOD Field Activity Directors re: Action Required for Solicitations and Contracts Impacted by Executive Order *Ending Radical and Wasteful Government DEI Programs* and the U.S. Office

of Personnel Management *Initial Guidance Regarding the DEIA Executive Orders*, is attached hereto as **Exhibit 11**.

13. A true and correct copy of an NBC News article, titled *Education Department Calls for Review of Grants Connected to DEI*, dated February 5, 2025, is attached hereto as **Exhibit 12**.

14. A true and correct copy of a Politico article, titled *DOGE announces \$881 million in cuts for Education Department Contracts*, dated February 10, 2025, is attached hereto as **Exhibit 13**.

15. A true and correct copy of EducationWeek article, titled *Trump Admin. Suddenly Cancels Dozens of Education Department Contracts*, dated Feb. 10, 2025, is attached hereto as **Exhibit 14**.

16. A true and correct copy of the White House issued Fact Sheet: *President Donald J. Trump Protects Civil Rights and Merit Based Opportunity by Ending Illegal DEI*, dated January 22, 2025, is attached hereto as **Exhibit 15**.

17. A true and correct copy of a Bluesky post of @muellershewrote.bsky.social reproducing a message sent to federal fund recipients announcing the new Certification Requirement and noting a change to “United States law,” dated February 7, 2025, is attached hereto as **Exhibit 16**.

18. A true and correct copy of the Department of Justice implementation memo distributed by the Attorney General to all Department Employees re: Ending Illegal DEI and Discrimination Preferences, dated February 5, 2025, is attached hereto as **Exhibit 17**.

19. A true and correct copy of NSF by the Numbers, Providing Statistical and Funding Information, dated February 11, 2025, is attached hereto as **Exhibit 18**.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed: February 13, 2025

s/ Brooke Menschel
Brooke Menschel